



Education Service Center

Executive Director
W. L. McKinney, Ph.D.

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Federal Communication Commission
William Caton, Assistant Secretary
1919 M Street, N.W., Room #222
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

RE: MM Docket #94-131

Dear Mr. Caton:

Region IV Education Service Center is an ITFS Licensee authorized to serve the Houston, Texas, community. I am writing to encourage the FCC to expand the Protected Service Area (PSA) for co-located ITFS and MMDS wireless licenses as proposed by the Wireless Cable Association International. The PSA should be expanded for many practical reasons, a few of which I bring to your attention below.

First, we have 36.3% of our ITFS receive sites beyond 15 miles from the system transmitters; this is in addition to future sites which may be subject to harmful interference relative to the PSA regulations. In association with People's Choice TV, our wireless system operator, we have served the public by expanding our role in distance learning. Our ITFS/Wireless system has a unique opportunity to provide modern technology services and revenues previously unavailable, creating a new era in the educator's mission. To effectively use these new tools that wireless cable provides, both the ITFS and wireless cable signals must enjoy an interference free transmission and its reception within the geographic areas we mutually serve.

Second, we plan to provide programming into the People's Choice customer household and businesses. If our wireless operator does not have an expanded PSA, then it may significantly limit their customer count and thus reduce our potential for viewership expansion. Wireless Technology such as signal addressability, extended distribution and up-graded receive sites are important to our needs. The combined ITFS/Wireless system can provide a cornucopia of programming into today's schools and elsewhere, such as into the work place and the home viewer households! An artificial fifteen mile limit inhibits this potential for an open classroom to the public.

Third, we rely on current and projected future lease fees derived from a per wireless customer formula. Without an expanded PSA for wireless cable, the subscriber base may be significantly and artificially limited. The result is reduced revenue for ITFS and its potential of expanding our role with enhanced services. In addition to our own institution plans, we envision that the wireless system allows the co-located ITFS licensees to engage joint efforts or expanding our combined services concurrent with our wireless operator's potential growth into locations beyond a 15 mile barrier. Not only does the People's Choice TV System growth affect our new era plans and revenue required to implement these plans, but with an expanded Protection Service Area for all system signals, the future for our complementary efforts becomes a reality.

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We ask that the Commission review with favor the practicality of expanding the wireless cable market's PSA. Without the People's Choice system's ability to serve our mutual marketplace in an interference free manner, the next era of our ITFS/Wireless future will be negatively impacted... funding for the provision of digital transmission, return path signal technology and expanded service choices for ITFS use.

Respectfully,



W. L. McKinney, Ph.D.

WLM:FPD:ds

cc: Honorable Reed Hundt
Honorable James Quello
Honorable Andrew Barrett
Honorable Rachelle Chong
Honorable Susan Ness
Roy Stewart